

FORT SILL QUARTERLY ENVIRONMENTAL NEWSLETTER

Fall 2015



This newsletter provides helpful information for protecting the environment and complying with environmental laws and regulations.

Environmental Training

We need to do a better job ensuring that Environmental Training is being taught throughout the entire Ft. Sill spectrum.

It doesn't seem like a year has gone by since first discussing the Environmental Training topic, but here we are. Given the constant turnover of active duty and replacement of civilian personnel it is essential to remind everyone of its importance.

Environmental training falls into the same category of mandatory training as SHARP, TARP, Information Security, Workplace violence, SETA, Human Trafficking, and Operations Security to name a few. Unlike most of these and mandatory training events, Environmental Training is not incorporated into the professional development curriculums as outlined in AR 350-1.

What does the previous paragraph mean to the commander / organization supervisor?

-First and foremost is that you may have a battery, battalion, brigade, or organization full of personnel with little or no environmental compliance knowledge. Lack of training is a citable offense.



This is a very risky endeavor given that an Environmental Notice of Violation (NOV) can cost an organization \$27,500 per incident, per day!

-Second is that most NOV fines are paid from unit training funds.

Lastly, as a leader, if you expect to meet a standard at any assigned task, then all the players have to be trained to a level of competence, and then tested. Suggestion: If the organization's SOP doesn't set the standard, it might be time to update it.

Environmental Training



AR 200-1 Environmental Protection and Enhancement provides environmental standards for all levels of command to attain.

One of the focuses of this newsletter is derived from AR 200-1, which states that this regulation implements Federal, State, and local environmental laws and DOD policies for preserving, protecting, and restoring the quality of the environment.

-Paragraph 1-1 a (13), Environmental training for military and civilian personnel.

-Paragraph 2-2 Army Environmental Policy Statement states: a. All Army organizations and activities will comply with applicable Federal, State, and local environmental laws, regulations, executive orders (EOs), or overseas Final Governing Standards (FGS) (see para 15-8 for

additional specific overseas requirements); develop and implement pollution prevention and control strategies; and establish environmental priorities in consideration of the benefits to the sustainment of missions and operations. b. All Army organizations and activities will strive to achieve continual improvement in overall environmental performance and supporting management systems. c. All Army organizations will ensure that this policy is implemented, maintained, and communicated to all military and civilian employees and supporting contractors. In addition, this policy will be made readily available to the public upon request. d. All contracts and contract modifications will specify that contractors are liable for any enforcement actions, fines, and/or penalties resulting from their failure to comply with applicable environmental requirements.

Additionally, this regulation prescribes program requirements in terms of "will" and "must", which mean that the actions are mandatory. All Army organizations will incorporate environmental considerations and requirements into all aspects of the organization's mission.

Knowledge is a powerful tool in Environmental Protection

Environmental Training

Fort Sill does a great job of making environmental training available for soldiers and civilians by providing a monthly 40 hour and 8 hour annual recertification Hazardous Waste Operations and Emergency Response Compliance course. Normally taught at the Education Center. This is the required training for all personnel assigned as Environmental Officers (EOs) at battery, battalion, brigade or comparable civilian agency. All POL handlers and mechanics should also receive this level of training as they are routinely in contact with hazardous materials during the accomplishment of their duties.

-The problem is: Commanders / Supervisors are not capitalizing on expertise they do have to ensure both senior and junior personnel know the current environmental standards.

-The solution is: Training is the key. By regulation Commanders/ organizations will

appoint a primary and alternate Environmental Officer (EPA definition, the Army does not require an officer). If you are a gambler, the odds of those two trained personnel catching all possible environmental violations before someone gets hurt, or the state / EPA find them, are not in your favor. By conducting internal environmental training you can turn 2 sets of classroom trained eyes into 50 or 100

sets of environmentally informed eyes all on the lookout for possible problems.

Not only are we achieving the Army standard for environmental training, but we are also providing training to personnel who will need this information to pass along to other soldiers / civilian personnel, and possible problem areas to their leaders. As a leaders we are charged with having to train our replacements. Leaders can only train subordinates when they know and understand the standards themselves.

The above statement is not intended to offend anyone as many individuals were not previously aware how few personnel receive formal environmental training. Now you know!

The following publications are essential to leaders in developing a compliant and effective environmental program : AR 200-1, ATP 3-34.5, TM 38-410 , TC 3-34.489. All of these publications are available electronically thru United States Army Publishing Agency (USAPA).

The Army Corps of Engineers also offers free on-line environmental training accessed thru <https://www.blackboard.wood.army.mil/> click on: courses search: ENV, enroll in: EO20xx.

For further information about compliance with environmental laws / regulations please contact Environmental Quality Division, DPW, 580-442-3266.